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AUG 15 2023

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By: Deputy Clerk

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Claimant In Pro Per
LARRY ROLLINS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA, ATLANTA DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$60,000 IN UNITED STATES CURRENCY AND
\$98,040 IN UNITED STATES CURRENCY,
Defendant(s).

Case No. 1:23-CV-01162-MLB

**ANSWER AND DEMAND FOR TRIAL BY
JURY BY CLAIMANT IN PRO PER
LARRY ROLLINS**

TO THE HONORABLE COURT AND THE OFFICE OF THE UNITED STATES ATTORNEY
FOR THE DISTRICT OF GEORGIA:

CLAIMANT In Pro Per Larry Rollins hereby answers the Plaintiff's Complaint For
Forfeiture In Rem (the "Complaint") as follows:

Claimant reserves the right to supplement and amend this Answer as necessary
as matters develop through discovery of certain facts and circumstances regarding the
Complaint and specifically reserves his right to file any applicable counterclaims. Any
and all allegations contained in the Complaint and not explicitly admitted herein, are to

1 be deemed denied.

2 Please take notice that Claimant demands trial by jury of the issues and defenses
3 raised by this answer and his/her claim.
4

5 1. Claimant lacks knowledge, information or recollection sufficient to form a
6 belief as to the truth of all the allegations contained in Paragraph 1 of the Complaint and,
7 therefore, generally and specifically denies all the allegations in Paragraph 1.

8 2. Claimant admits all allegations contained in Paragraph 2 of the Complaint.

9 3. Claimant admits all allegations contained in Paragraph 3 of the Complaint.

10 4. Claimant admits all allegations contained in Paragraph 4 of the Complaint.

11 5. Claimant denies all allegations contained in Paragraph 5 of the Complaint.

12 6. Claimant denies all allegations contained in Paragraph 6 of the Complaint.

13 7. Claimant lacks knowledge, information or recollection sufficient to form a
14 belief as to the truth of all the allegations contained in Paragraph 7 of the Complaint and,
15 therefore, generally and specifically denies all the allegations in Paragraph 7.

16 8. Claimant lacks knowledge, information or recollection sufficient to form a
17 belief as to the truth of all the allegations contained in Paragraph 8 of the Complaint and,
18 therefore, generally and specifically denies all the allegations in Paragraph 8.

19 9. Claimant lacks knowledge, information or recollection sufficient to form a
20 belief as to the truth of all the allegations contained in Paragraph 9 of the Complaint and,
21 therefore, generally and specifically denies all the allegations in Paragraph 9.

22 10. Claimant lacks knowledge, information or recollection sufficient to form a
23 belief as to the truth of all the allegations contained in Paragraph 10 of the Complaint
24 and, therefore, generally and specifically denies all the allegations in Paragraph 10.

25 11. Claimant lacks knowledge, information or recollection sufficient to form a
26 belief as to the truth of all the allegations contained in Paragraph 11 of the Complaint
27 and, therefore, generally and specifically denies all the allegations in Paragraph 11.
28

1 12. Claimant lacks knowledge, information or recollection sufficient to form a
2 belief as to the truth of all the allegations contained in Paragraph 12 of the Complaint
3 and, therefore, generally and specifically denies all the allegations in Paragraph 12.

4 13. Claimant lacks knowledge, information or recollection sufficient to form a
5 belief as to the truth of all the allegations contained in Paragraph 13 of the Complaint
6 and, therefore, generally and specifically denies all the allegations in Paragraph 13.

7 14. Claimant lacks knowledge, information or recollection sufficient to form a
8 belief as to the truth of all the allegations contained in Paragraph 14 of the Complaint
9 and, therefore, generally and specifically denies all the allegations in Paragraph 14.

10 15. Claimant lacks knowledge, information or recollection sufficient to form a
11 belief as to the truth of all the allegations contained in Paragraph 15 of the Complaint
12 and, therefore, generally and specifically denies all the allegations in Paragraph 15.

13 16. Claimant lacks knowledge, information or recollection sufficient to form a
14 belief as to the truth of all the allegations contained in Paragraph 16 of the Complaint
15 and, therefore, generally and specifically denies all the allegations in Paragraph 16.

16 17. Claimant lacks knowledge, information or recollection sufficient to form a
17 belief as to the truth of all the allegations contained in Paragraph 17 of the Complaint
18 and, therefore, generally and specifically denies all the allegations in Paragraph 17.

19 18. Claimant lacks knowledge, information or recollection sufficient to form a
20 belief as to the truth of all the allegations contained in Paragraph 18 of the Complaint
21 and, therefore, generally and specifically denies all the allegations in Paragraph 18.

22 19. Claimant lacks knowledge, information or recollection sufficient to form a
23 belief as to the truth of all the allegations contained in Paragraph 19 of the Complaint
24 and, therefore, generally and specifically denies all the allegations in Paragraph 19.

25 20. Claimant lacks knowledge, information or recollection sufficient to form a
26 belief as to the truth of all the allegations contained in Paragraph 20 of the Complaint
27 and, therefore, generally and specifically denies all the allegations in Paragraph 20.
28

1 21. Claimant admits all allegations contained in Paragraph 21 of the
2 Complaint..

3 22. Claimant lacks knowledge, information or recollection sufficient to form a
4 belief as to the truth of all the allegations contained in Paragraph 22 of the Complaint
5 and, therefore, generally and specifically denies all the allegations in Paragraph 22.

6 23. Claimant lacks knowledge, information or recollection sufficient to form a
7 belief as to the truth of all the allegations contained in Paragraph 23 of the Complaint
8 and, therefore, generally and specifically denies all the allegations in Paragraph 23.

9 24. Claimant lacks knowledge, information or recollection sufficient to form a
10 belief as to the truth of all the allegations contained in Paragraph 24 of the Complaint
11 and, therefore, generally and specifically denies all the allegations in Paragraph 24.

12 25. Claimant lacks knowledge, information or recollection sufficient to form a
13 belief as to the truth of all the allegations contained in Paragraph 25 of the Complaint
14 and, therefore, generally and specifically denies all the allegations in Paragraph 25.

15 26. Claimant lacks knowledge, information or recollection sufficient to form a
16 belief as to the truth of all the allegations contained in Paragraph 26 of the Complaint
17 and, therefore, generally and specifically denies all the allegations in Paragraph 26.

18 27. Claimant lacks knowledge, information or recollection sufficient to form a
19 belief as to the truth of all the allegations contained in Paragraph 27 of the Complaint
20 and, therefore, generally and specifically denies all the allegations in Paragraph 27.

21 28. Claimant lacks knowledge, information or recollection sufficient to form a
22 belief as to the truth of all the allegations contained in Paragraph 28 of the Complaint
23 and, therefore, generally and specifically denies all the allegations in Paragraph 28.

24 29. Claimant lacks knowledge, information or recollection sufficient to form a
25 belief as to the truth of all the allegations contained in Paragraph 29 of the Complaint
26 and, therefore, generally and specifically denies all the allegations in Paragraph 29.

27 30. Claimant lacks knowledge, information or recollection sufficient to form a
28

1 belief as to the truth of all the allegations contained in Paragraph 30 of the Complaint
2 and, therefore, generally and specifically denies all the allegations in Paragraph 30.

3 31. Claimant lacks knowledge, information or recollection sufficient to form a
4 belief as to the truth of all the allegations contained in Paragraph 31 of the Complaint
5 and, therefore, generally and specifically denies all the allegations in Paragraph 31.

6 32. Claimant lacks knowledge, information or recollection sufficient to form a
7 belief as to the truth of all the allegations contained in Paragraph 32 of the Complaint
8 and, therefore, generally and specifically denies all the allegations in Paragraph 32.

9 33. Claimant lacks knowledge, information or recollection sufficient to form a
10 belief as to the truth of all the allegations contained in Paragraph 33 of the Complaint
11 and, therefore, generally and specifically denies all the allegations in Paragraph 33.

12 34. Claimant lacks knowledge, information or recollection sufficient to form a
13 belief as to the truth of all the allegations contained in Paragraph 34 of the Complaint
14 and, therefore, generally and specifically denies all the allegations in Paragraph 34.

15 35. Claimant lacks knowledge, information or recollection sufficient to form a
16 belief as to the truth of all the allegations contained in Paragraph 35 of the Complaint
17 and, therefore, generally and specifically denies all the allegations in Paragraph 35.

18 36. Claimant lacks knowledge, information or recollection sufficient to form a
19 belief as to the truth of all the allegations contained in Paragraph 36 of the Complaint
20 and, therefore, generally and specifically denies all the allegations in Paragraph 36.

21 37. Claimant lacks knowledge, information or recollection sufficient to form a
22 belief as to the truth of all the allegations contained in Paragraph 37 of the Complaint
23 and, therefore, generally and specifically denies all the allegations in Paragraph 37.

24 38. Claimant lacks knowledge, information or recollection sufficient to form a
25 belief as to the truth of all the allegations contained in Paragraph 38 of the Complaint
26 and, therefore, generally and specifically denies all the allegations in Paragraph 38.

27 39. Claimant lacks knowledge, information or recollection sufficient to form a
28

1 belief as to the truth of all the allegations contained in Paragraph 39 of the Complaint
2 and, therefore, generally and specifically denies all the allegations in Paragraph 39.

3 40. Claimant lacks knowledge, information or recollection sufficient to form a
4 belief as to the truth of all the allegations contained in Paragraph 40 of the Complaint
5 and, therefore, generally and specifically denies all the allegations in Paragraph 40.

6 41. Claimant lacks knowledge, information or recollection sufficient to form a
7 belief as to the truth of all the allegations contained in Paragraph 41 of the Complaint
8 and, therefore, generally and specifically denies all the allegations in Paragraph 41.

9 42. Claimant lacks knowledge, information or recollection sufficient to form a
10 belief as to the truth of all the allegations contained in Paragraph 42 of the Complaint
11 and, therefore, generally and specifically denies all the allegations in Paragraph 42.

12 43. Claimant lacks knowledge, information or recollection sufficient to form a
13 belief as to the truth of all the allegations contained in Paragraph 43 of the Complaint
14 and, therefore, generally and specifically denies all the allegations in Paragraph 43.

15 44. Claimant lacks knowledge, information or recollection sufficient to form a
16 belief as to the truth of all the allegations contained in Paragraph 44 of the Complaint
17 and, therefore, generally and specifically denies all the allegations in Paragraph 44.

18 45. Claimant lacks knowledge, information or recollection sufficient to form a
19 belief as to the truth of all the allegations contained in Paragraph 45 of the Complaint
20 and, therefore, generally and specifically denies all the allegations in Paragraph 45.

21 46. Claimant lacks knowledge, information or recollection sufficient to form a
22 belief as to the truth of all the allegations contained in Paragraph 46 of the Complaint
23 and, therefore, generally and specifically denies all the allegations in Paragraph 46.

24 47. Claimant lacks knowledge, information or recollection sufficient to form a
25 belief as to the truth of all the allegations contained in Paragraph 47 of the Complaint
26 and, therefore, generally and specifically denies all the allegations in Paragraph 47.

27 48. Claimant lacks knowledge, information or recollection sufficient to form a
28

1 belief as to the truth of all the allegations contained in Paragraph 48 of the Complaint
2 and, therefore, generally and specifically denies all the allegations in Paragraph 48.

3 49. Claimant lacks knowledge, information or recollection sufficient to form a
4 belief as to the truth of all the allegations contained in Paragraph 49 of the Complaint
5 and, therefore, generally and specifically denies all the allegations in Paragraph 49.

6 50. Claimant lacks knowledge, information or recollection sufficient to form a
7 belief as to the truth of all the allegations contained in Paragraph 50 of the Complaint
8 and, therefore, generally and specifically denies all the allegations in Paragraph 50.

9 51. Claimant lacks knowledge, information or recollection sufficient to form a
10 belief as to the truth of all the allegations contained in Paragraph 51 of the Complaint
11 and, therefore, generally and specifically denies all the allegations in Paragraph 51.

12 52. Claimant lacks knowledge, information or recollection sufficient to form a
13 belief as to the truth of all the allegations contained in Paragraph 52 of the Complaint
14 and, therefore, generally and specifically denies all the allegations in Paragraph 52.

15 53. Claimant lacks knowledge, information or recollection sufficient to form a
16 belief as to the truth of all the allegations contained in Paragraph 53 of the Complaint
17 and, therefore, generally and specifically denies all the allegations in Paragraph 53.

18 54. Claimant lacks knowledge, information or recollection sufficient to form a
19 belief as to the truth of all the allegations contained in Paragraph 54 of the Complaint
20 and, therefore, generally and specifically denies all the allegations in Paragraph 54.

21 55. Claimant lacks knowledge, information or recollection sufficient to form a
22 belief as to the truth of all the allegations contained in Paragraph 55 of the Complaint
23 and, therefore, generally and specifically denies all the allegations in Paragraph 55.

24 56. Claimant lacks knowledge, information or recollection sufficient to form a
25 belief as to the truth of all the allegations contained in Paragraph 56 of the Complaint
26 and, therefore, generally and specifically denies all the allegations in Paragraph 56.

27 57. Claimant lacks knowledge, information or recollection sufficient to form a
28

1 belief as to the truth of all the allegations contained in Paragraph 57 of the Complaint
2 and, therefore, generally and specifically denies all the allegations in Paragraph 57.

3 58. Claimant lacks knowledge, information or recollection sufficient to form a
4 belief as to the truth of all the allegations contained in Paragraph 58 of the Complaint
5 and, therefore, generally and specifically denies all the allegations in Paragraph 58.

6 59. Claimant lacks knowledge, information or recollection sufficient to form a
7 belief as to the truth of all the allegations contained in Paragraph 59 of the Complaint
8 and, therefore, generally and specifically denies all the allegations in Paragraph 59.

9 60. Claimant lacks knowledge, information or recollection sufficient to form a
10 belief as to the truth of all the allegations contained in Paragraph 60 of the Complaint
11 and, therefore, generally and specifically denies all the allegations in Paragraph 60.

12 61. Claimant lacks knowledge, information or recollection sufficient to form a
13 belief as to the truth of all the allegations contained in Paragraph 61 of the Complaint
14 and, therefore, generally and specifically denies all the allegations in Paragraph 61.

15 62. Claimant lacks knowledge, information or recollection sufficient to form a
16 belief as to the truth of all the allegations contained in Paragraph 62 of the Complaint
17 and, therefore, generally and specifically denies all the allegations in Paragraph 62.

18 63. Claimant lacks knowledge, information or recollection sufficient to form a
19 belief as to the truth of all the allegations contained in Paragraph 63 of the Complaint
20 and, therefore, generally and specifically denies all the allegations in Paragraph 63.

21 64. Claimant lacks knowledge, information or recollection sufficient to form a
22 belief as to the truth of all the allegations contained in Paragraph 64 of the Complaint
23 and, therefore, generally and specifically denies all the allegations in Paragraph 64.

24 65. Claimant lacks knowledge, information or recollection sufficient to form a
25 belief as to the truth of all the allegations contained in Paragraph 65 of the Complaint
26 and, therefore, generally and specifically denies all the allegations in Paragraph 65.

27 66. Claimant lacks knowledge, information or recollection sufficient to form a
28

1 belief as to the truth of all the allegations contained in Paragraph 66 of the Complaint
2 and, therefore, generally and specifically denies all the allegations in Paragraph 66.

3 67. Claimant lacks knowledge, information or recollection sufficient to form a
4 belief as to the truth of all the allegations contained in Paragraph 67 of the Complaint
5 and, therefore, generally and specifically denies all the allegations in Paragraph 67.

6 68. Claimant lacks knowledge, information or recollection sufficient to form a
7 belief as to the truth of all the allegations contained in Paragraph 68 of the Complaint
8 and, therefore, generally and specifically denies all the allegations in Paragraph 68.

9 69. Claimant lacks knowledge, information or recollection sufficient to form a
10 belief as to the truth of all the allegations contained in Paragraph 69 of the Complaint
11 and, therefore, generally and specifically denies all the allegations in Paragraph 69.

12 70. Claimant lacks knowledge, information or recollection sufficient to form a
13 belief as to the truth of all the allegations contained in Paragraph 70 of the Complaint
14 and, therefore, generally and specifically denies all the allegations in Paragraph 70.

15 71. Claimant lacks knowledge, information or recollection sufficient to form a
16 belief as to the truth of all the allegations contained in Paragraph 71 of the Complaint
17 and, therefore, generally and specifically denies all the allegations in Paragraph 71.

18 72. Claimant lacks knowledge, information or recollection sufficient to form a
19 belief as to the truth of all the allegations contained in Paragraph 72 of the Complaint
20 and, therefore, generally and specifically denies all the allegations in Paragraph 72.

21 73. Claimant lacks knowledge, information or recollection sufficient to form a
22 belief as to the truth of all the allegations contained in Paragraph 73 of the Complaint
23 and, therefore, generally and specifically denies all the allegations in Paragraph 73.

24 74. Claimant lacks knowledge, information or recollection sufficient to form a
25 belief as to the truth of all the allegations contained in Paragraph 74 of the Complaint
26 and, therefore, generally and specifically denies all the allegations in Paragraph 74.

27 75. Claimant lacks knowledge, information or recollection sufficient to form a
28

1 belief as to the truth of all the allegations contained in Paragraph 75 of the Complaint
2 and, therefore, generally and specifically denies all the allegations in Paragraph 75.

3 76. Claimant lacks knowledge, information or recollection sufficient to form a
4 belief as to the truth of all the allegations contained in Paragraph 76 of the Complaint
5 and, therefore, generally and specifically denies all the allegations in Paragraph 76.

6 77. Claimant denies all allegations contained in Paragraph 77 of the Complaint.

7 78. Claimant denies all allegations contained in Paragraph 78 of the Complaint.
8

9 **AFFIRMATIVE DEFENSES**
10

11 79. Claimant repeats the denials and affirmations of the allegations set forth in
12 paragraphs 1 through 78 of this Answer, as though fully set forth here. In addition,
13 Claimant raises the following numbered defenses to the Complaint.
14

15 **FIRST DEFENSE**
16

17 80. The Complaint, and each purported claim for relief, fails to state facts
18 sufficient to constitute claim(s) upon which relief can be granted to defeat Claimant's
19 claim to subject property or properties.
20

21 **SECOND DEFENSE**
22

23 81. The Plaintiff lacks probable cause for belief that a substantial connection
24 exists between the property or properties sought to be forfeited and any unlawful
25 conduct.
26

27 **THIRD DEFENSE**
28

1
2 82. N/A.
3

4 **FOURTH DEFENSE**
5

6 83. The evidence seized during the search must be suppressed as the fruit of
7 an unreasonable search and seizure under the Fourth Amendment to the United States
8 Constitution and *One 1958 Plymouth Sedan v. Commonwealth of Pennsylvania*, 380 U.S.
9 693 (1965).
10

11
12 **FIFTH DEFENSE**
13

14 84. The forfeiture of the defendant property or properties, in addition to any
15 criminal punishment, fines and assets that may be forfeited would be grossly
16 disproportionate punishment in violation of the Eight Amendment's Excessive Fines
17 Clause, and *Austin v. United States*, 509 U.S. 602 (1993).
18

19 **SIXTH DEFENSE**
20

21 85. Plaintiff has failed to comply with several statutory notice requirements,
22 which, among other legal consequences, make the Complaint void and null.
23

24 **SEVENTH DEFENSE**
25

26 86. Without waiving any defense asserted above, Claimant further asserts that
27 defendant property or properties are not subject to forfeiture on the basis that any act
28

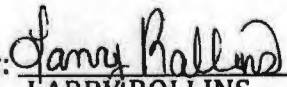
1 or omission, if any, on the part of any other individual that would potentially give rise to
2 forfeiture of the defendant properties, was committed or omitted without the
3 knowledge or consent of the Claimant.

4
5 WHEREFORE, Claimant prays that the Honorable Court will:

- 6
7 1. Dismiss the Complaint and enter judgment on behalf of the Claimant and
8 that Plaintiff take nothing by reason of this suit;
9 2. Deny issuance of a certificate of reasonable cause pursuant to
10 28 U.S.C. § 2465 and award costs and attorney's fees to the Claimant; and
11 3. Provide such other and further relief, both legal and equitable, as the Court
12 deems proper and just.

13
14 DATED: August 8, 2023

Respectfully submitted,

15
16
17 By: 
18 LARRY ROLLINS
19 Claimant In Pro Per
20
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22
23
24
25
26
27
28

PROOF OF SERVICE

I, Gina Garfias, declare as follows:

I am over the age of eighteen years, and not a party to the within case; my business address is The Lentz Law Firm, P.C., 9171 Wilshire Blvd, Suite 500, Beverly Hills, California 90210. August 11, 2023, I served the within:

**ANSWER AND DEMAND FOR TRIAL BY JURY BY CLAIMANT IN PRO PER
LARRY ROLLINS**

in the United States District Court, for the Northern District of Georgia, Atlanta Division, Court Case No.1:23-CV-01162-MLB, by sending a true copy thereof, as indicated and addressed as follows:

Norman L. Barnett
Assistant United States Attorney
75 Ted Turner Drive, S.W.,
Suite 600
Atlanta, GA, 30303



(BY MAIL) By placing such document in an envelope, with postage thereon fully prepaid for First Class Mail. I am readily familiar with the process of collection and processing of correspondence, said practice being that in the ordinary course of business, correspondence is deposited in the United States Postal Service the same day as it is placed for collection.



(BY PERSONAL SERVICE) By causing such document to be delivered by hand with instructions that it be personally served.



(BY FACSIMILE) By placing such document for collection and transmission at the office of The Lentz Law Firm, P.C., Los Angeles, California, to the facsimile numbers listed above. I am readily familiar with the practice of The Lentz Law Firm, P.C., for collection and processing of facsimiles, said practice being that in the ordinary course of business, facsimiles are transmitted immediately after being placed for processing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on August 11, 2023, at Beverly Hills, CA.

Gina Garfias
Gina Garfias

THE LENTZ LAW FIRM, P.C.
9171 WILSHIRE BLVD, SUITE 500, BEVERLY HILLS, CA 90210
Telephone: 213/250-9200 Facsimile: 888/571-5591

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UNITED STATES US

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ATLANTA GA 30303

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